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January 21, 2022

VIA ECF

Honorable Eric N. Vitaliano
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Hough v. Maraj and Petty*, Case No. 21-cv-04568-ENV-JRC

Dear Judge Vitaliano:

I am in receipt of Mr. Gordon's January 21, 2022 letter in response (Doc. No. 53). Unless the Court would like me to do so, I am not going to respond to the multiple outrageous and demonstrably false accusations he has made against me.

The letter which I filed yesterday only asked the Court, as required by Your Honor's Individual Motion Practice and Rules, to set a briefing schedule for a motion which my client has the right to bring even if Mr. Gordon believes it to be meritless.

Mr. Gordon's effort to bar me from filing a sanctions motion – primarily pursuant to 28 U.S.C. § 1927 and the Court's inherent power – is itself frivolous. As I have told him, if he reads my motion after I serve it and he concludes that it is frivolous or otherwise improper, he has every right to seek sanctions against me and I will cooperate in setting a briefing schedule for that motion.

Since Mr. Gordon's letter does not address a briefing schedule, I request that Your Honor order the schedule set forth in my January 20, 2022 letter: (a) Ms. Maraj will serve her motion on January 26, 2022, (b) Plaintiff and her counsel will serve their answer to the motion on February 9, 2022, and (c) Ms. Maraj will serve her reply and file the bundled motion papers on February 25, 2022.

Respectfully yours,
/s/ Judd Burstein
Judd Burstein

cc: All counsel (via ECF)